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May 05, 2025

Honorable Margaret M. Garnett  
United States District Judge  
Southern District of New York  
40 Foley Square, Room 2102  
New York, NY 10007

RE: *Palantir Technologies Inc. v. Guardian AI, Inc., et al.*, No. 1:25-cv-01977-MMG

Dear Judge Garnett:

Pursuant to Your Honor's Individual Rule I.B.5, all named parties to the action have conferred and jointly request an extension of the following deadlines:

	Original Date	Requested Date
Defendants' Response to the Complaint	May 12, 2025	June 11, 2025 (30 day extension)
Initial Pretrial Conference	May 15, 2025	Any date after June 23, 2025 at the Court's convenience (so that the parties' joint letter can reflect Defendants' response to the Complaint)

This is the parties' first request for an extension of time to respond to the complaint. The parties request this extension for the following three reasons:

- First, the parties are in discussions toward resolving the matter. The extension may therefore moot the need for the Defendants to respond and the Initial Pretrial Conference with the Court.
- Second, the current schedule requires the parties to submit their Joint Letter and Case Management Statement on May 8, 2025, which is four days before Defendants' response to the Complaint is due. As such, the Joint Letter and Case Management Statement could therefore be materially incomplete: it would not reflect the nature of Defendants' response to the Complaint and the parties' views as to how the response should affect the matters addressed in that submission.
- Third, Plaintiff's counsel is traveling on May 15, 2025, the scheduled date for the Initial Pretrial Conference with the Court.

As noted above, Plaintiff and all named Defendants consent to, and request, this relief .

Respectfully submitted,

/s/ Michael J. McMahon

Michael J. McMahon (*pro hac vice*  
*forthcoming*)

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